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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN DIVISION**

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IN RE: VALSARTAN,  
LOSARTAN, AND  
IRBESARTAN PRODUCTS  
LIABILITY LITIGATION

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No. 1:19-md-2875-RBK  
Hon. Robert B. Kugler  
Hon. Karen M. Williams

**NOTICE OF MOTION**

(Document Filed Electronically)

**NOTICE OF MOTION TO MODIFY SPECIAL MASTER ORDER NO. 23,  
PURSUANT TO FED. R. CIV. P. 53(f)**

**PLEASE TAKE NOTICE** that on August 2, 2021, or as soon as counsel may be heard, the undersigned Defense Executive Committee counsel, on behalf of all Manufacturer Defendants named in the operative Master Personal Injury Complaint (“PI Complaint”) (Dkt. [122](#)), the operative Consolidated Second Amended Economic Loss Class Action Complaint (Dkt. [398](#)), and the operative Consolidated Amended Medical Monitoring Class Action Complaint (“MM Complaint”) (Dkt. [123](#)) shall move for the entry of an Order modifying Special Master Order No. 23

(Dkt. [1304](#)), entered on June 9, 2021. In this motion, the undersigned defendants respectfully object to Paragraph 4 of Special Master Order No. 23 disallowing the Manufacturer Defendants' First Set of Global Interrogatories and Requests for Production (Doc. [1287-10](#)) and hereby seek modification of that order to allow the nine (9) Requests for Production of Documents propounded on Plaintiffs on May 24, 2021 (*see* Dkt. [1287-10](#)). This objection and motion to modify Special Master Order No. 23 is made to the Hon. Robert B. Kugler, United States District Judge, pursuant to Rule 53(f) of the Federal Rules of Civil Procedure and the applicable local rules of this Court.

**PLEASE TAKE FURTHER NOTICE** that in support of its motion, the undersigned defendants shall rely upon the Memorandum of Law in Support submitted herewith, and any reply submissions made hereafter; and

**PLEASE TAKE FURTHER NOTICE** that a proposed Order is submitted herewith; and

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested, pursuant to Fed. R. Civ. P. 53(f)(1), if this motion is opposed.

Dated: June 30, 2021

**GREENBERG TRAURIG, LLP**

/s/ Lori. G. Cohen  
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Victoria Davis Lockard

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 30, 2021, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

*/s/ Gerond J. Lawrence*  
Gerond J. Lawrence